

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION

IN RE:

**CAH ACQUISITION COMPANY #1, LLC,
d/b/a WASHINGTON COUNTY HOSPITAL,**

CASE NO. 19-00730-5-JNC

Debtor,

CHAPTER 11

**THOMAS W. WALDREP, JR., as
LITIGATION TRUSTEE**

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Plaintiff,

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**ADVERSARY PROCEEDING
NO. 22-00101-5-JNC**

v.

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)

**REBOOT, INC., d/b/a HIPAA GUARD,
RURAL LAB OUTREACH, LLC, and
MICHAEL REECE,**

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)
)

Defendants.

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IN RE:

**CAH ACQUISITION COMPANY #2, LLC,
d/b/a OSWEGO COMMUNITY HOSPITAL,**

CASE NO. 19-01230-5-JNC

Debtor,

CHAPTER 11

**THOMAS W. WALDREP, JR., as
LITIGATION TRUSTEE**

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Plaintiff,

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**ADVERSARY PROCEEDING
NO. 22-00102-5-JNC**

v.

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**REBOOT, INC., d/b/a HIPAA GUARD,
RURAL LAB OUTREACH, LLC, and
MICHAEL REECE,**

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)
)

Defendants.

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IN RE:

**CAH ACQUISITION COMPANY #3, LLC,
d/b/a HORTON COMMUNITY HOSPITAL,**

CASE NO. 19-01180-5-JNC

Debtor,

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|---|---|--|
| THOMAS W. WALDREP, JR., as LITIGATION TRUSTEE |) | ADVERSARY PROCEEDING NO. 22-00103-5-JNC |
| Plaintiff, |) | |
| v. |) | |
| REBOOT, INC., d/b/a HIPAA GUARD, RURAL LAB OUTREACH, LLC, and MICHAEL REECE, |) | ADVERSARY PROCEEDING NO. 22-00103-5-JNC |
| Defendants. |) | |
| |) | |

IN RE:

**CAH ACQUISITION COMPANY 6, LLC,
d/b/a I-70 COMMUNITY HOSPITAL,**

CASE NO. 19-01300-5-JNC

Debtor,

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|---|---|--|
| THOMAS W. WALDREP, JR., as CHAPTER 7 TRUSTEE |) | ADVERSARY PROCEEDING NO. 22-00104-5-JNC |
| Plaintiff, |) | |
| v. |) | |
| REBOOT, INC., d/b/a HIPAA GUARD, RURAL LAB OUTREACH, LLC, and MICHAEL REECE, |) | ADVERSARY PROCEEDING NO. 22-00104-5-JNC |
| Defendants. |) | |
| |) | |

IN RE:

**CAH ACQUISITION COMPANY 7, LLC,
d/b/a PRAGUE COMMUNITY HOSPITAL,**

Debtor,

THOMAS W. WALDREP, JR., as)
LITIGATION TRUSTEE)
Plaintiff,)
v.)
REBOOT, INC., d/b/a HIPAA GUARD,)
RURAL LAB OUTREACH, LLC, and)
MICHAEL REECE,)
Defendants.)

CASE NO. 19-01298-5-JNC

CHAPTER 11

**ADVERSARY PROCEEDING
NO. 22-00105-5-JNC**

IN RE:

**CAH ACQUISITION COMPANY 12, LLC,
d/b/a FAIRFAX COMMUNITY HOSPITAL,**

Debtor,

THOMAS W. WALDREP, JR., as)
LITIGATION TRUSTEE)
Plaintiff,)
v.)
REBOOT, INC., d/b/a HIPAA GUARD,)
RURAL LAB OUTREACH, LLC, and)
MICHAEL REECE,)
Defendants.)

CASE NO. 19-01697-5-JNC

CHAPTER 11

**ADVERSARY PROCEEDING
NO. 22-00106-5-JNC**

IN RE:

**CAH ACQUISITION COMPANY 16, LLC,
d/b/a HASKELL COUNTY COMMUNITY
HOSPITAL,**

CASE NO. 19-01227-5-JNC

Debtor,

CHAPTER 11

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|---|---|-----------------------------|
| THOMAS W. WALDREP, JR., as LIQUIDATING TRUSTEE |) | |
| Plaintiff, |) | ADVERSARY PROCEEDING |
| |) | NO. 22-00107-5-JNC |
| v. |) | |
| REBOOT, INC., d/b/a HIPAA GUARD, RURAL LAB OUTREACH, LLC, and MICHAEL REECE, |) | |
| Defendants. |) | |

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND DOCUMENTS

Please take notice that, pursuant to Bankruptcy Rules 2002, 9007 and 9010, the undersigned is appearing on behalf of Reboot, Inc., d/b/a HIPAA Guard, Rural Lab Outreach, LLC, and Michael Reece, Defendants in this case. It is hereby requested as follows:

1. Matrix/Roster. The undersigned requests that an entry be made on the electronic matrix/roster of creditors to receive notice in this case maintained by the Clerk of the United States Bankruptcy Court.
2. Receipt of Notices. The undersigned requests to be served with all documents filed with the court and all notices which the court and/or other parties are required to serve. This request includes all papers, reports, orders, notices, copies of applications, motions, petitions, disclosure statements, plans of readjustment of debts or reorganization, pleadings, appendices, exhibits, requests or demands, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, electronic mail, courier service, delivery service, telephone, facsimile, telegraph, telex or otherwise.

3. No Express or Implied Acceptance of Service. This Notice of Appearance does not give express or implied consent by the undersigned or Womble Bond Dickinson (US) LLP to

accept service of process of any action commenced under Rule 7001 of the Federal Rules of Bankruptcy Procedure.

4. No Waiver of Rights. This Notice of Appearance shall not be deemed or construed to be a waiver of the rights of Defendants of the following:

- a. To have final orders in noncore matters entered only after *de novo* review by a United States District Judge;
- b. To trial by jury in any case or proceeding related to this case;
- c. To have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal or to seek abstention by the United States Bankruptcy Court on any matter; or
- d. To any other rights, remedies, claims, actions, defenses, setoffs, or recoupments to which Defendants are or may be entitled, in law or in equity, all of which are expressly reserved.

Dated: August 31, 2023

WOMBLE BOND DICKINSON (US) LLP

/s/ Jesse A. Schaefer

Jesse A. Schaefer
NC State Bar No. 44773
555 Fayetteville Street, Suite 1100
Raleigh, NC 27601
Telephone: (919) 755-8182
Email: jesse.schaefer@wbd-us.com

*Counsel for Defendants Reboot, Inc. d/b/a/ HIPAA
Guard, Rural Lab Outreach, LLC; and Michael
Reece*

CERTIFICATE OF SERVICE

I, the undersigned, or Womble Bond Dickinson (US) LLP certifies:

That I am, at all times hereinafter mentioned was, more than eighteen (18) years of age;

That on this day, the foregoing Notice of Appearance and Request for Notices and Documents was served by electronic means through the court's CM/ECF service on:

Micah E. Marcus, Esq.
John Van Swearingen, Esq.
Attorneys for Plaintiff

I certify under penalty of perjury that the foregoing is true and correct.

Dated: August 31, 2023

WOMBLE BOND DICKINSON (US) LLP

By: /s/ Jesse A. Schaefer
Jesse A. Schaefer

*Counsel for Defendants Reboot, Inc. d/b/a/ HIPAA
Guard, Rural Lab Outreach, LLC; and Michael
Reece*